UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF WESTLAND POLICE AND FIRE :   Civil Action No. 1:12-cv-00256-LAK
RETIREMENT SYSTEM, Individually and on :
Behalf of All Others Similarly Situated, :   <u>CLASS ACTION</u>
                                 :
                   Plaintiff, :   DECLARATION OF SHAWN A.
                                 :   WILLIAMS IN SUPPORT OF PLAINTIFF'S
     vs.   :   MOTION FOR LEAVE TO FILE THE
                                 :   [PROPOSED] SECOND AMENDED CLASS
METLIFE INC., et al.,   :   ACTION COMPLAINT FOR VIOLATION
                                 :   OF THE FEDERAL SECURITIES LAWS
              Defendants. :
                                 :

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I, SHAWN A. WILLIAMS, declare as follows:

1.   I am an attorney duly licensed to practice before all of the courts of the State of

California and New York and before this District Court. I am a member of the law firm of Robbins

Geller Rudman & Dowd LLP, counsel of record for plaintiff in the above-entitled action. I have

personal knowledge of the matters stated herein and, if called upon, I could and would competently

testify thereto.

2.   Attached hereto are true and correct copies of the following exhibits:

Exhibit A: [Proposed] Second Amended Class Action Complaint for Violation of the
              Federal Securities Laws;

Exhibit B: Redlined version comparing [Proposed] Second Amended Class Action
              Complaint for Violation of the Federal Securities Laws with the Amended
              Class Action Complaint for Violation of the Federal Securities Laws; and

Exhibit C: *In re Lehman Bros. Sec. and ERISA Litig.*, No. 1:09-md-02017-LAK, Pretrial
              Order No. 17 (S.D.N.Y. Sept. 8, 2010) (Judge L. Kaplan).

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed this 15th day of March, 2013, in San Francisco, California.

                                              s/ Shawn A. Williams
                                              SHAWN A. WILLIAMS

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<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on March 15, 2013, I authorized the electronic filing of the foregoing

with the Clerk of the Court using the CM/ECF system which will send notification of such filing to

the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I

caused to be mailed the foregoing document or paper via the United States Postal Service to the non-

CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed on March 15, 2013.

s/ Shawn A. Williams
SHAWN A. WILLIAMS

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Mailing Information for a Case 1:12-cv-00256-LAK

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Thomas C. Michaud
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